

# American Electric Power

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Friday, January 12, 2001

Docket Management Facility  
U.S. Dept. of Transportation  
Room 401, 400 Seventh St. SW.  
Washington, D.C., 20590-0001

To Whom it May Concern,

This letter is to comment on the proposed rulemaking [USCG 2000-6931] - 15 concerning Fire-Suppression systems and Voyage Planning, specifically Voyage Planning. To propose a rule to require that a voyage plan be prepared on all non-exempt vessels before every voyage and make it a requirement before the details of how the rule will be implemented and what it will require are known, make it extremely difficult to comment on. The rule makers are even estimating how long it will take to prepare such plans and how much it will cost industry before they have decided what would be required in a voyage plan. It is simply impossible to comment either in support or opposition when the details are unknown and I believe it is unreasonable to make a final rule with few or no details before the parties affected can study or comment upon what will be required of them.

I also strongly urge that public meetings be conducted in other locations besides Washington, particularly in areas more easily accessible to mariners operating on the Western Rivers. To the best of my knowledge this is the first time that voyage planning has been proposed for this rule dealing with fire-protection measures, it is unreasonable to propose it now and make it a part of the final rule with a very abbreviated time frame for comments and review by the parties that are affected.

The proposed rule is attempting to implement a "one size fits all" solution to an industry that has very fundamental differences in the way it operates in different areas. The concept of voyage planning does not sound unreasonable if you are applying it to a vessel that is departing on a voyage from one point, with one barge, to deliver it at another point. This is probably what the rule makers envisioned. On the Western Rivers and certain other areas, voyages are not that clearly defined. Towing vessels may operate continuously for months at a time. Would this be considered one voyage? They often handle thousands of barges in a period of several months. They make numerous pickups and deliveries every day. Their orders often change hourly. These operating conditions make it impossible as well as unreasonable to expect a master to prepare a formal "voyage plan". There are occasions when a towing vessel may pickup a tow of barges at one point and proceed with them to another, but this is the exception rather than the rule. A typical master operating on the Western Rivers may receive orders and order changes several times each day. Will

he be required to prepare a new voyage plan each time? The destinations for individual barges, in a tow of up to thirty-five or forty, may change several times before they are delivered. Will each change in destination require a new plan? Barges are picked-up and delivered, in some cases several times a watch. Will these changes require a new voyage plan? An inland towboat may leave its "port" and be on a continuous voyage for months. It may change masters while underway eight or nine times in a year. How will this rule affect these kinds of operations? In most cases these changes in orders and tow make-up take place while under way. The vessel is not tied off, when will the master prepare the voyage plan? Will he be required to do it after he goes off watch? Won't this violate the requirement that a plan be completed before the voyage begins? Will this be a violation of the "twelve hour" rule?

Without more details, about the implementation of this rule, it is impossible for us to make specific comments. This rule should not become part of the final rule until the details are decided upon and the effected parties have a reasonable opportunity to comment.

Yours Truly,

A handwritten signature in cursive script, appearing to read "Bruce Darst", with a long, sweeping horizontal line extending to the right.

Bruce Darst  
Master Pilot